

AMENDMENT TO VERIFIED COMPLAINT AND EXHIBIT INDEX

Audury P Davis -plaintiff

V.

New American Funding- Defendant

Case No. 125:-CV-690

FILED
HARRISBURG, PA

JUN 06 2025

PER


DEPUTY CLERK

COMES NOW, Audury Petie Davis, pro se litigant, respectfully submitting this Amendment to the Verified Complaint and accompanying Exhibit Index previously filed in the above-captioned matter, and states as follows:

1. Plaintiff respectfully requests to be added as a co-plaintiff to this matter, with all rights, responsibilities, and claims consistent with the original complaint and filings.
2. The original Exhibit G, labeled as 'Voicemail USB Transcript,' is hereby corrected and relabeled as Exhibit F2 to prevent duplication and maintain accurate recordkeeping. The original Exhibit G is already part of the record as 'Formal Complaints Filed After Exhaustion.'
3. The bounce-back related to the Preservation Notice emailed on April 17, 2025, is introduced and labeled as Exhibit D2. This supplement follows Exhibit D, which contains the March 2025 escalation attempt bounce-back.
5. All amendments herein are intended to supplement the original Verified Complaint and Exhibits filed. These corrections ensure factual accuracy and coherence for the benefit of the Court and all parties.
6. On May 22, 2025, Plaintiff filed a Notice of Urgency Addendum to incorporate into the record Exhibit O, consisting of sensitive loan documents that were improperly sent outside the secure loan portal. This Exhibit remains a critical part of the evidentiary record supporting the claims of mishandling and negligence.
7. On June 6, 2025, Plaintiff further amends the record to include Exhibit P, titled "Risk Summary and Forecast Analysis," which outlines the potential reputational, regulatory, and financial risks posed to the defendant if discovery proceeds. This exhibit is submitted to support Plaintiff's claims of negligence, data mishandling, and obstructive conduct, and serves as a warning of material exposure resulting from continued litigation.

Respectfully submitted,

Audury Petie Davis
Pro Se Litigant


Certificate of Service

I hereby certify that on this 6 day of June, 2025, a true and correct copy of the foregoing Amendment to Verified Complaint and Exhibit Index was served upon the defendant, New American Funding, through its registered agent by hand delivery as follows:

New American Funding
c/o Registered Agent
125 Locust Street
Harrisburg, Pennsylvania 17101

Respectfully submitted,

Audury Petie Davis
Pro Se Plaintiff


Signature

Audury Petie Davis III

Co-Plaintiff / Authorized Representative for Maryann Butler

1823 State Street

Harrisburg, PA 17103

Phone: (717) 424-8220

Email: mfmallah87@icloud.com

June 6, 2025

Clerk of Court

U.S. District Court

Middle District of Pennsylvania

Ronald Reagan Federal Building

228 Walnut Street

Harrisburg, PA 17101

RE: Official Filing of Verified Complaint and Related Documents

Butler et al. v. New American Funding

Dear Clerk,

Please accept for official filing and docketing the following documents in the above-captioned civil matter. I am submitting these materials with the applicable filing fee to open this civil case on the record:

1. Verified Civil Complaint
2. Verified Motion to Expedite Discovery
3. Amendment to Verified Complaint, including:

- Addition of Co-Plaintiff Audury Petie Davis III
- Updated Factual Allegations and Supporting Exhibit P
- 4. Updated Exhibit Index
- 5. Certificate of Service
- 6. Cover Letter (this document)

Please time-stamp one copy for our records. We will also be serving the Defendant of Record immediately following this filing.

Thank you for your time and assistance.

Respectfully,

/s/ Audury Petie Davis III

A handwritten signature in dark ink, appearing to read "Audury P. Davis III", with a stylized flourish at the end.

Audury Petie Davis III

Co-Plaintiff / Authorized Representative